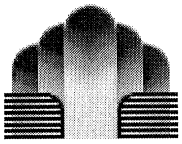
201-14431



Peter Wendol kowski

05/02/2003 11:42 AM

To: Peter Wendolkowski/DC/USEPA/US@EPA
cc:
cc:
Subject: Environmental Defense comments on 4-Hydroxyanisole (CAS#150-76-5)

Richard_Denison@environmentaldefense.org on 04/30/2003 11:50:26 AM

To: oppt.ncic@epamail.epa.gov, hpv.chemrtk@epamail.epa.gov, Rtk Chem/DC/USEPA/US@EPA, Karen Boswell/DC/USEPA/US@EPA, sonny maher@americanchemistry.com
cc: MTC@mchsi.com, LUCIERG@msn.com, kflorini@environmentaldefense.org, rdenison@environmentaldefense.org

Subject: Environmental Defense comments on 4-Hydroxyanisole (CAS#150-76-5)

(Submitted via Internet 4/30/03 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and sonny _ maher@americanchemistry.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for 4-Hydroxyanisole (CAS#150-76-5).

The Hydroquinone Monomethyl Ether Task Force of the American Chemistry Council's Hydroquinone Precursors and Derivatives Panel has submitted a Robust Summary/Test Plan for 4-hydroxyanisole under the High Production Volume Challenge Program. On review of the Test Plan, we find that it provides only a cursory description of the chemical, its uses and possible sources of environmental and human exposure. It does state that some human exposure to this chemical occurs as a result of its pharmacological use to lighten skin, and adds that this use has been reviewed and approved by the Food and Drug Administration. In our opinion, further description of the uses, transport and possible sources of human and environmental exposure to this chemical is warranted.

However, based on our review of the Robust Summary, available data suggest that 4-hydroxyanisole is a relative safe chemical. It has little apparent toxicity to any organism tested and does not persist in the environment. Neither is it genotoxic or carcinogenic.

The Robust Summary provides much more descriptive information of some of the studies done than the Test Plan, which is extremely cursory. The Robust Summary also contains a summary of at least one study to address each requested SIDS element. Some of these studies are old and preceded the development of GLP, but they appear to be adequate. We feel it would be more helpful to the interested public if all data presented in the Robust Summary were noted and better summarized in the Test Plan. However, we concur that sufficient data exist for 4-hydroxyanisole to meet the High Production Volume Challenge requirements and that no additional studies are required.

Thank you for this opportunity to comment.

Hazel B. Matthews, Ph.D.
Consulting Toxicologist, Environmental Defense

Richard Denison, Ph.D.
Senior Scientist, Environmental Defense